

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

SANTIAGO QUEZADA, SR.

Debtor

Case 24-22431-SHL

Chapter 11, Subchapter V

DECLARATION OF MARIA JOSE PIZARRO

I, Maria Jose Pizaaro, hereby declare:

1. I am a United States citizen and reside in Queens. English is not my first/primary language, which is Spanish.

2. I was the general manager of Euros El Tina Restaurant Lounge and Billiards Corp. (Euros El Tina), an entity owned by the debtor in this case, Santiago Quezada, Sr., and am a judgment creditor of he and Euros El Tina.

3. While general manager, Mr. Quezada told me that he maintains bank accounts in the Dominican Republic at Banco Popular (now named Popular Bank) and Scotiabank.

4. In addition, a paid Dominican public records search concerning real estate he owns there indicates that he owns property worth around \$12 million. A true copy of that search together with an English translation is attached as Exhibit 1.

5. On afternoon of September 11, 2024, I got an email from email@ortizandortiz.com, signed by Nicolas Santacruz, Paralegal, attaching a document titled "Notice of Deadline Requiring Filing of Proofs of Claim on or before September 13, 2024" and a blank proof of claim form. A true copy of that email is attached as Exhibit 2.

6. I never consented to receiving notices by email in this bankruptcy case.

7. Having been notified I had two days before the deadline that I had to file a claim, and as the scope of engagement of my attorneys' in the underlying litigation did not cover

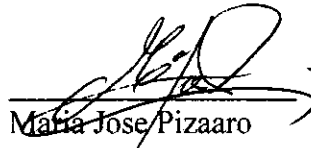
representation of me in a separate bankruptcy case, I prepared the proof of claim form pro se and emailed a copy back to the same address set forth above the following day. A true copy of that email is attached as Exhibit 3.

8. Several days later, I also tried to upload a PDF copy to this Court. A true copy of the confirmation email is attached as Exhibit 4.

9. I subsequently learned that I had used this Court's pro se upload tool which does not add claims to the register, instead of this Court's web-based proof of claim tool which does. At the time, I did not know about the web-based proof of claim tool.

10. Following these multiple attempts, I imposed on Evan Brustein, one of my attorneys in the underlying litigation, to electronically file the proof of claim for me with this Court.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2025.


Maria Jose Pizaaro